

WRIGHT, FINLAY & ZAK, LLP

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Attorney for GREEN TREE LOAN SERVICING LLC

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON (TACOMA)**

JAMES A. BIGELOW

Plaintiff,

vs.

NORTHWEST TRUSTEE SERVICES, INC.;
GREEN TREE SERVICING, LLC; MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS,
INC.; and DOE DEFENDANTS 1-20,

Defendants.

GREEN TREE SERVICING, LLC,

Counter-Plaintiff,

vs.

JAMES A. BIGELOW and CAROLYN
BIGELOW, husband and wife; and ALL
PERSONS OR PARTIES UNKNOWN
CLAIMING ANY RIGHT, TITLE, ESTATE,
LIEN, OR INTEREST IN THE PROPERTY
DESCRIBED IN THE COMPLAINT HEREIN,

Counter-Defendants.

Case No.: 3:14-cv-05798 BHS

**AMENDED MOTION FOR ENTRY
OF DEFAULT**

MOTION FOR DEFAULT ON
COUNTER-COMPLAINT

WFZ File No.: 229-2013426

Renee M. Parker (SBN 36995)
Wright, Finlay, & Zak, LLP
4665 MacArthur Blvd., Suite 200
Newport Beach, CA 92660

PH: (949) 477-5050/FAX: (949) 608-9142

Pursuant to Rule 44(a) of the Federal Rules of Civil Procedure, the Counter-Plaintiff moves the Court to enter the default of all Counter-Defendants. The SUMMONS, and COUNTERCLAIM AND THIRD-PARTY COMPLAINT FOR JUDICIAL FORECLOSURE was served on all known defendants either directly or by publication as authorized by the Court, and the time for filing a response to the Counter-Complaint has lapsed. An Affidavit in support of this motion is filed concurrently herewith.

Dated: March 10, 2015

Respectfully submitted,
WRIGHT, FINLAY, & ZAK, LLP

By: 

Renee M. Parker, WSBA # 36995
Attorneys for Counter-Plaintiff,

MOTION FOR DEFAULT ON
COUNTER-COMPLAINT

WFZ File No.: 229-2013426

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Wright, Finlay, & Zak, LLP
4665 MacArthur Blvd., Suite 200
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CERTIFICATE OF SERVICE

I, Steven E. Bennett, declare as follows:

I am employed in the County of Orange, State of California. I am over the age of eighteen (18) and not a party to the within action. My business address is 4665 MacArthur Court, Suite 280, Newport Beach, California 92660. I am readily familiar with the practices of Wright, Finlay & Zak, LLP, for collection and processing of correspondence for mailing with the United States Postal Service. Such correspondence is deposited with the United States Postal Service the same day in the ordinary course of business.

On March 10, 2015, I served the within **AMENDED MOTION FOR ENTRY OF DEFAULT** on all interested parties in this action as follows:

PLAINTIFF:

James A Bigelow
sistermoonproductions@gmail.com

Wells Fargo Bank, N.A.
c/o Corporation Service Company, Registered Agent For Service of Process
Attn: Juanita Huey
300 Deschutes Way SW., Suite 304
Tumwater, WA 98501

Oak Ridge Yelm Homeowners Association
Attn: Ruth Meenk – Designated Person
5120 Klahanie Dr. NW
Olympia, WA 98502

Timothy Dietz
10018 Cascadian Ave SE
Yelm, WA 98597

Current Occupant (All Persons or Parties Unknown Claiming Any Right, Title, Estate, Lien, Or Interest in The Property Described in The Complaint)
10018 Cascadian Ave. SE
Yelm, WA 98597

☒ by placing [] the original ☒ a true copy thereof enclosed in sealed envelope(s) addressed as follows:

☒ (BY MAIL SERVICE) I placed such envelope(s) for collection to be mailed on this date following ordinary business practices.

1 [X] (BY ELECTRONIC MAIL) I caused each such document to be transmitted electronically
2 to the parties at the e-mail address indicated. To the best my knowledge, the transmission
3 was reported as complete, and no error was reported that the electronic transmission was
not completed.

4 [] (CM/ECF Electronic Filing) I caused the above document(s) to be transmitted to the
5 office(s) of the addressee(s) listed by electronic mail at the e-mail address(es) set forth
6 above pursuant to Fed.R.Civ.P.5(b)(2)(E). "A Notice of Electronic Filing (NEF) is
7 generated automatically by the ECF system upon completion of an electronic filing. The
8 NEF, when e-mailed to the e-mail address of record in the case, shall constitute the proof
of service as required by Fed.R.Civ.P.5(b)(2)(E). A copy of the NEF shall be attached to
any document served in the traditional manner upon any party appearing pro se."

9 [] (BY FACSIMILE) The facsimile machine I used, with telephone no. (949) 477-9200,
10 complied with California Rules of Court, Rule 2003, and no error was reported by the
machine.

11 [] (BY NORCO DELIVERY SERVICE - NEXT DAY DELIVERY) I placed true and
12 correct copies of thereof enclosed in a package designated by Norco Delivery Service
with the delivery fees provided for.

13 [] (State) I declare under penalty of perjury under the laws of the state of California that the
14 foregoing is true and correct.

15 [X] (FEDERAL) I declare that I am employed in the office of a member of the bar of this
16 court at whose direction the service was made.

17 Executed on March 10, 2015 at Newport Beach, California.

18 
19 Steven E. Bennett

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On March 10, 2015, I served the within **AMENDED AFFIDAVIT OF RENEE M. PARKER, ESQ. OF FAILURE TO PLEAD OR OTHERWISE DEFEND IN SUPPORT OF MOTION FOR ENTRY OF DEFAULT** on all interested parties in this action as follows:

PLAINTIFF:

James A Bigelow
sistermoonproductions@gmail.com

Wells Fargo Bank, N.A.
c/o Corporation Service Company, Registered Agent For Service of Process
Attn: Juanita Huey
300 Deschutes Way SW., Suite 304
Tumwater, WA 98501

Oak Ridge Yelm Homeowners Association
Attn: Ruth Meenk – Designated Person
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any document served in the traditional manner upon any party appearing pro se."

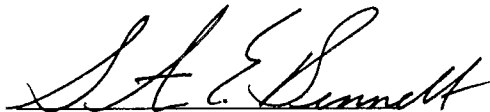
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